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REMARKS

To date, the Examiner has not indicated that the subject matter of the information disclosure statements (IDS's) filed May 12, 2005 and October 05, 2005 has been properly considered. A copy of such IDS's is submitted herewith. If the Examiner requires additional copies of any reference(s), applicant invites the Examiner to contact the undersigned. Documentation in the file wrapper of the instant application confirming the Examiner's consideration of the reference(s) is respectfully requested.

The Examiner has maintained the previous rejection. As set forth below, such rejection is deficient. However, despite such deficiencies and in the spirit of expediting the prosecution of the present application, applicant has incorporated the subject matter of multiple dependent claims into each of the independent claims. Since the subject matter of such dependent claims was already considered by the Examiner, it is asserted that such claim amendments would **not** require new search and/or consideration.

The Examiner has rejected Claims 1, 3-7, 9-10, 12-16, 18-20, 22-24, 26, 28-30, 32-33, 36-37, 39, 42-43, 45-46, 50-51, 55-57, 59, 61, 63, 65-66, 69 and 72-77 under 35 U.S.C. 103(a) as being unpatentable over Steinberg (U.S. Patent No. 6,587,949) in view of Matsushita (European Patent Application No. 00309498.4) in further view of Friedman (U.S. Patent No. 5,499,294). Applicant respectfully disagrees with such rejection, especially in view of the amendments made hereinabove to the independent claims.

With respect to all of the independent claims, the Examiner has relied on Col. 4, lines 4-11 in Steinberg to make a prior art showing of applicant's claimed "removable storage medium storing at least one of the encryption cryptographic key and the decryption cryptographic key, where the removable storage medium is removable with respect to the transportable storage medium" (see this or similar, but not identical language in each of the independent claims).

However, after careful review of such excerpt, it is clear that Steinberg only teaches a device (PCMCIA card) that merely stores readable files. There is simply no disclosure in Steinberg of a device storing either an encryption cryptographic key or a decryption cryptographic key, in the manner claimed by applicant. Furthermore, such device in Steinberg is only removable with respect to a PCMCIA card slot of a digital camera (see Col. 3, lines 43-45), and is not removable with respect a transportable storage medium, as claimed by applicant.

In the latest Office Action dated 9/19/2005, the Examiner has responded to applicant's arguments by relying on Col. 6, lines 47-48 and 58-59 in Steinberg to meet applicant's specific claim language. Applicant notes that such excerpt merely teaches a "storage device [that] is initially programmed with a security key." However, after careful review of the entire Steinberg reference, applicant also notes that Figure 1 in Steinberg, to which the above excerpt relates, only shows the removable storage mediums (items 10, 30 and 42) being removable with respect to the camera (item 14) and personal computer (item 16), but not that "the removable storage medium is removable with respect to the transportable storage medium" as specifically claimed by applicant (emphasis added).

Also in the latest Office Action dated 9/19/2005, the Examiner has further argued that he fails to see the relevance of applicant's above argument regarding the PCMCIA card. Applicant respectfully asserts that Col. 4, lines 4-11, as relied on by the Examiner, teaches a device 10 that is "inserted into the PCMCIA slot 20 of the computer 16." The excerpt further teaches that such device stores readable files. Thus, applicant has inferred that the device in Steinberg is a PCMCIA card such that it can be inserted into the PCMCIA slot taught by Steinberg.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or

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in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed.Cir.1991).

Applicant respectfully asserts that at least the third element of the *prima facie* case of obviousness has not been met, since the prior art references, when combined, fail to teach or suggest <u>all</u> of the claim limitations, as noted above. Nevertheless, despite such paramount deficiencies and in the spirit of expediting the prosecution of the present application, applicant has substantially incorporated the subject matter of Claims 4 and 73 et al. into each of the independent claims.

With respect to the subject matter of Claim 4 et al., the Examiner has relied on Col. 5, lines 52-57 in Steinberg to make a prior art showing of applicant's claimed "validation module validating the decryption cryptographic key against user-provided credentials prior to decrypting the encrypted frames" (see the same or similar, but not identical language incorporated into each of the independent claims). Applicant respectfully asserts that such excerpt merely teaches that decrypting data "require[es] special software in the computer, including a password and/or key." Cleary, such teaching does not even suggest any sort of "<u>validati[on of] the</u> decryption cryptographic <u>key</u>," as claimed by applicant, but instead only generally discloses that a password and/or key is required to decrypt encrypted data.

With respect to the subject matter of Claim 73, as presently incorporated into each of the independent claims, the Examiner has relied on Col. 3, lines 59-61 and Col. 4, lines 4-11 in Steinberg to make a prior art showing of applicant's claimed technique "wherein the removable storage medium includes memory that is coupled to a standardized

connector which enables utilization of at least one of a plurality of encryption cryptographic keys and a plurality of decryption cryptographic keys."

Applicant respectfully asserts that such excerpts only teach a storage device that can be removed from a camera and inserted into a PCMCIA slot of a computer. Clearly, a storage device does not meet applicant's specific claim language. In particular, applicant claims a "removable storage medium [that] includes memory" (emphasis added). Furthermore, applicant claims that such memory is "coupled to a standardized connector" (emphasis added), and not merely that the removable storage medium itself is coupled to a standardized connector, as taught in Steinberg.

Applicant respectfully asserts that at least the third element of the *prima facie* case of obviousness has not been met, since the prior art references, when combined, fail to teach or suggest all of the claim limitations, as noted above.

Thus, all of the independent claims are deemed allowable. Moreover, the remaining dependent claims are further deemed allowable, in view of their dependence on such independent claims.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 50-1351 (Order No. NAI1P374/01.101.01).

Respectfully submitted,
Zilka-Kotab, PC.
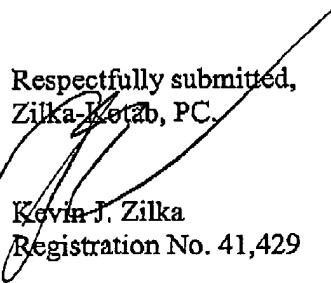
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